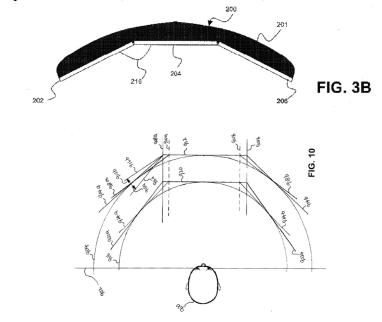


To the extent the arms of the NYSE System are not bowed, the arms at least face a user. It would have been obvious for a person of ordinary skill in the art to have modified the arms of the NYSE System such that the arms are bowed at the front so that in use the arms tends to wrap around a user positioned in front of and viewing the displays. Such a modification would have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to have modified the arms of the NYSE System in view of one or more of the following secondary references to configure the arms so that they are bowed at the front of the arms and so that in use the arms tends to wrap around a user positioned in front of and viewing the displays:

#### **Secondary References**

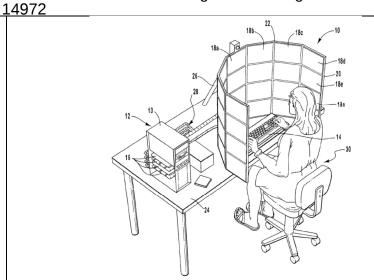
# (1) The '337 patent

The '337 patent relates to a multi-panel video display system having a plurality of displays that are arranged so the display panels are substantially equidistant from an eye point of a user. The patent discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays. For example, the display panels are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. (column 2, lines 30-60).



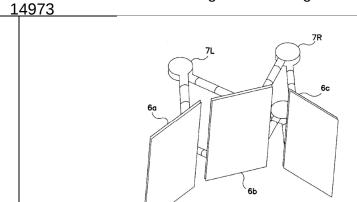
# (2) The '328 publication

The '328 publication describes a multi-screen display system that includes a plurality of display screens that are concave in shape about a user. (Abstract). The publication discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.



#### (3) The '890 patent

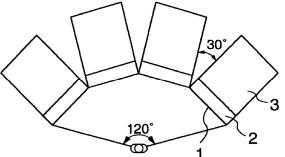
The '890 patent discloses a two-dimensional image display device that includes a curved display system wrapping about a user. The patent discloses that the display system is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.

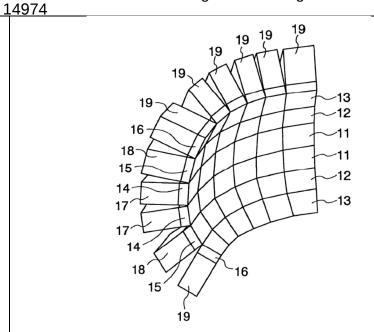


# (4) The '153 patent

The '153 patent discloses a multi-display apparatus that arranges display devices across a concave surface both in a horizontal visibility angle direction and a vertical visibility angle direction. The patent discloses that the display devices are bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.

FIG. 3A

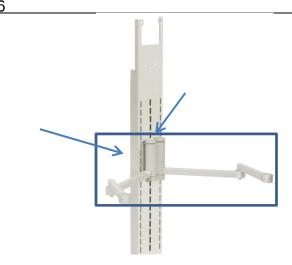




# (5) The Ergotron Design Station

The Ergotron Design Station discloses a display system that has a support arm assembly that is bowed at the front of the support arm assembly so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays.

	4975
	PC Workstation
b) adapted to support all of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm, and c) substantially horizontal in use,	The arms of the NYSE System are adapted to support all of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm, and substantially horizontal in use. See, for example, displays 130 in Exhibit.
the support arm structure further comprising a mounting member with a hole and at least one aperture,	The support arm structure of the NYSE System includes a mounting member with a hole and at least one aperture.

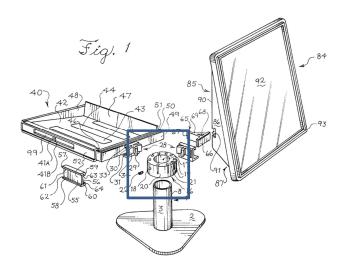


In addition, to the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting member with a hole and at least one aperture is a clamp that goes over a pole and has an opening for a tightening screw. To the extent the NYSE System does not have a support arm that includes a mounting member with a hole and at least one aperture, such a feature would have been obvious to a person of ordinary skill in the art. For example, it would have been obvious to have modified the NYSE System, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, and the '939 patent to include a clamp that goes over a pole and an opening for a tightening screw.

# **Secondary Reference**

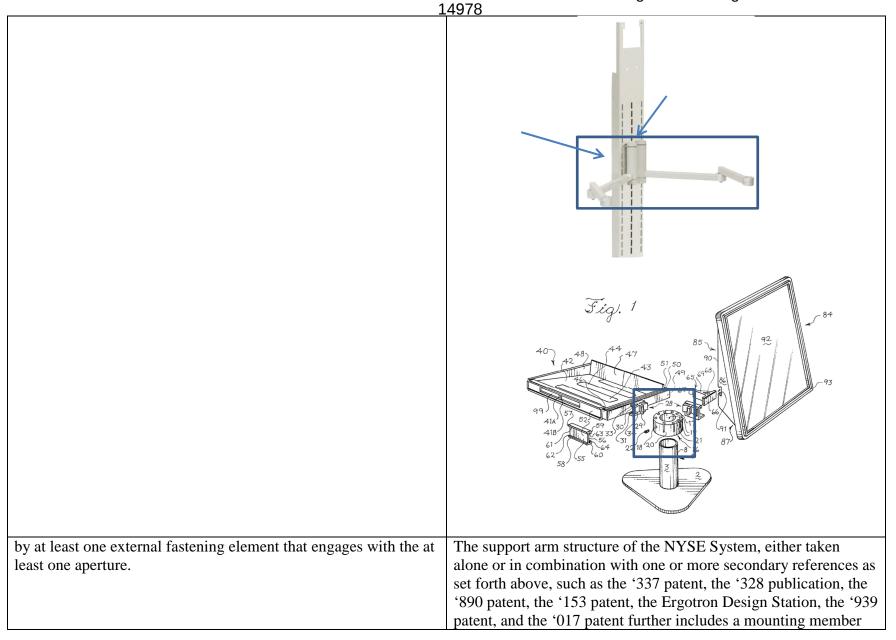
The '017 patent

The '017 patent describes a display system having a foundational unit. With respect to FIG. 1, the reference describes the foundational unit 1 comprised of a base 2 and column 3. A supporting collar 16 can slip over the column 3 and is mounted to the column by means of a screw.



such that the support arm structure, and the single piece support arm thereof, is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and

The support arm structure of the NYSE System, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, the '939 patent, and the '017 patent further includes a mounting member with a hole and at least one aperture such that the support arm structure, and single piece support arm thereof, is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole. For example,



with a hole and at least one aperture such that the support arm structure, and single piece support arm thereof, is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and by at least one external fastening element that engages with the at least one aperture. For example,

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5 ig). 1  85  92  44  48  47  49  49  49  49  49  49  49  49  49

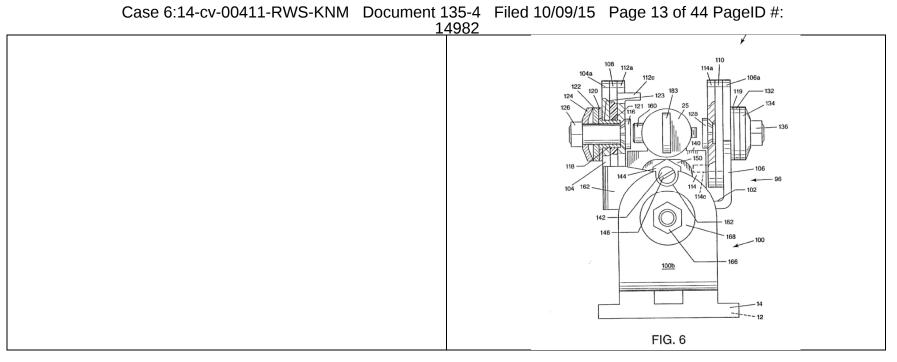
Claim 2	The NYSE System
The display system of claim 1,	
further comprising the at least two displays.	The NYSE System further comprises at least two displays. See,
	for example, displays 130 in Exhibit.

Claim 3	The NYSE System
The display system of claim 1,	
wherein the base is adapted to rest on a flat and horizontal work surface.	The base of the NSYE System, either alone or in combination with one or more secondary references, such as the '939 patent as set forth above, is adapted to rest on a flat and horizontal work surface. See, for example, base 110 in Exhibit resting on a flat and horizontal floor. In addition, the '939 patent discloses a base 12 adapted to rest on a flat and horizontal work surface.

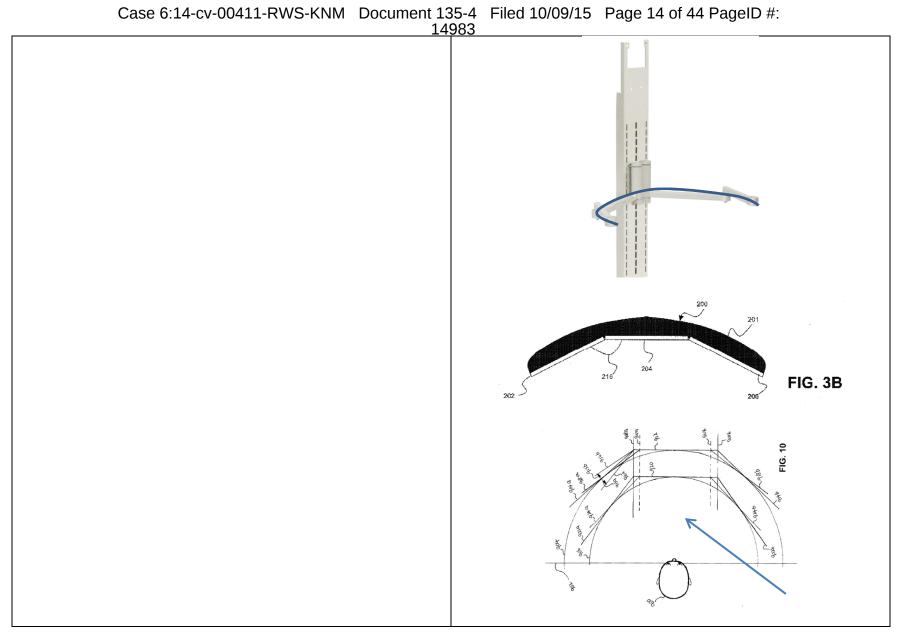
Cl.: 4	TELL MINICE CO. A
Claim 4	The NYSE System
9-00	

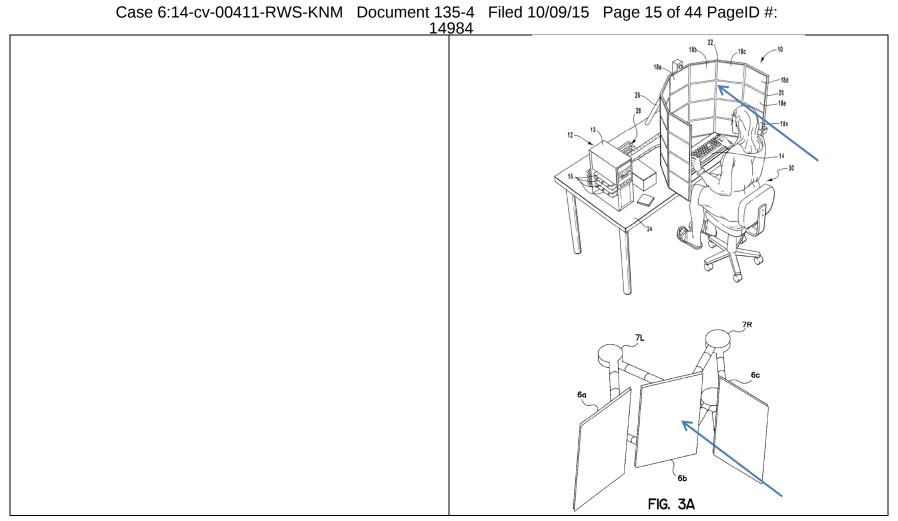
Case 6:14-cv-00411-RWS-KNM Document 135-4 Filed 10/09/15 Page 12 of 44 PageID #: 14981

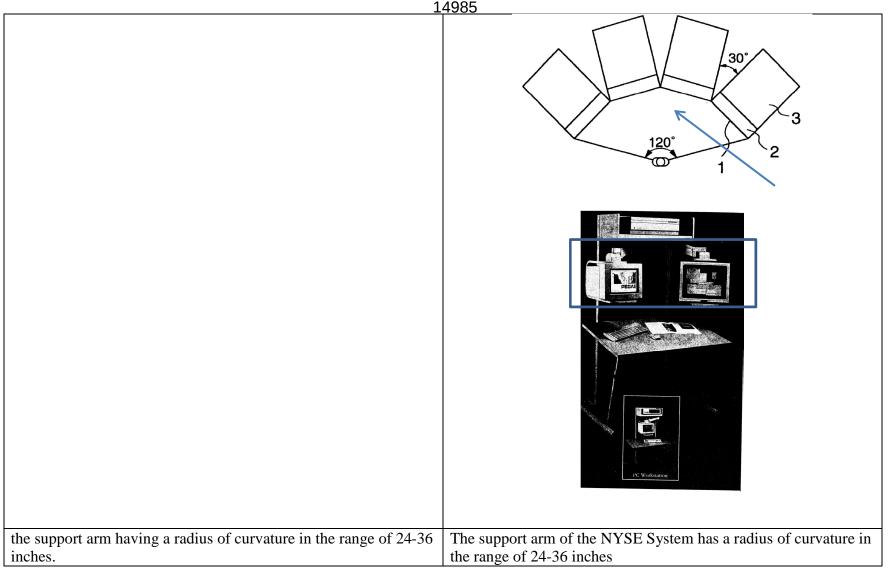
The display system of claim 3,	
wherein at least two of the connectors permit two of the displays	At least two of the connectors of the NYSE System, either alone
to angle independently.	or in combination with one or more secondary references, such as
	the '672 patent as set forth above, permit two of the displays to
	angle independently.



Claim 5	The NYSE System
The display system of claim 1,	
wherein the support arm is bowed at the front oldie arm,	The support arm of the NYSE System, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent and the Ergotron Design Station, is bowed at the front of the arm.







14	4986
	In addition, configuring the support arm to have a radius of curvature in the range of 24-36 inches would have been a mere
	design choice that would have been obvious according to known
	methods to yield predictable results. For example, it would have
	been obvious to modified the NYSE System in view of one or
	more secondary references as set forth above, such as the '337
	patent, the '328 publication, the '890 patent, the '153 patent and
	the Ergotron Design Station to yield a radius of curvature in the
	range of 24-36 inches. In particular, the display panels of the
	'337 patent are disclosed as being arranged between

approximately 18 inches and approximately 24 inches from an eye point of a user. This range overlaps with the claimed range.

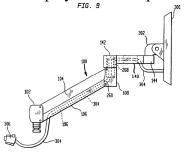
Claim 6	The NYSE System
The display system of claim 4,	
wherein the support arm includes a channel within which cables	It would have been obvious to have modified the support arm of
for the displays can be disposed.	the NYSE System, either taken alone or in combination with one
	or more secondary references as set forth above, such as the '337

patent, the '328 publication, the '890 patent, the '153 patent and the Ergotron Design Station, to further include a channel within which cables for the displays can be disposed.

#### **Secondary References**

#### (1) The '134 patent

The '134 patent relates to an arm apparatus for mounting electronic device and includes a support arm having a channel within which cables for displays can be disposed.



### (2) The '484 patent

The '484 patent describes a cable routing duct and discloses that use of a cable routing duct provides for orderly branching and routing of wires, cables and the like. The patent discloses a support arm-style structure that includes a channel within which cables can be disposed.

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14988
10 14 12 36h 38d 38d 38d 38d 38d 38d 38d 38d

Claim 7	The NYSE System
The display system of claim 1,	
wherein the at least two connectors includes three connectors and the at least two displays includes three displays,	It would have been obvious to a person of ordinary skill in the art to have modified the NYSE System so the at least two connectors include three connectors and the at least two displays includes three displays. Such a modification would have been obvious as a mere duplication of parts using known techniques to yield predictable results. For example it would have been obvious to have modified the NYSE System in view of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, and the '153 patent, which disclose display systems with three or more monitors and three or more connectors.
the display system comprising the three displays.	It would have been obvious to a person of ordinary skill in the art to have modified the NYSE System so the display system comprises three displays. Such a modification would have been obvious as a mere duplication of parts using known techniques to yield predictable results. For example it would have been obvious to have modified the NYSE System in view of one or

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more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, and the '153 patent,
which disclose display systems with three or more monitors.

Claim 8	The NYSE System
The display system of claim 1,	
wherein the support arm is rigid.	The support arm of the NYSE System is rigid. See, for example,
	Exhibit.

Claim 9	The NYSE System
A display system comprising:	The NYSE System provides a display system 100.
a base for resting on a surface;	The NYSE System provides a base 110 for resting on a surface.  In addition, configuring the NYSE System with a different type of base would have been obvious to a person of ordinary skill in the art as simple substitution of one known element for another known element to yield predictable results.  Secondary Reference  The '939 patent
	The '939 patent discloses a display system having a base 12 for resting on a surface, a pair of electronic displays, and an arm assembly that supports the displays.

	4990
	52 20 50 18 22 14 FIG. 4
a support column attached to the base and	The NYSE System, either alone or in combination with a secondary reference, such as the '939 patent, has a support column 120 connected to the base 110.
having a mounting portion extending in a vertical direction away from the base when the surface is horizontal;	To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting portion is a portion of a support column to which the support arm mounts. The support column 120 in the NYSE System has a portion to which a support arm mounts. The mounting portion extends in a vertical direction away from the base when the base is horizontal.

a support arm structure secured to the support column, the support arm structure having a support arm that extends on either side of the column, that is substantially horizontal when the base is resting on a horizontal surface and that has a longitudinal length that is longer than the width of the base;

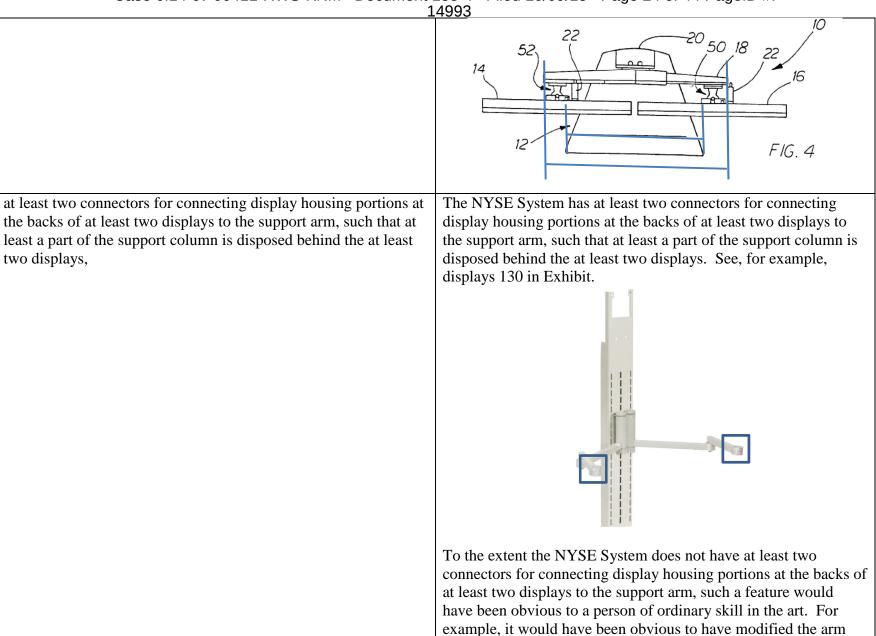
The NYSE System, either alone or in combination with a secondary reference, such as the '939 patent, has a support arm structure secured to the support column, the support arm structure secured to the support column, that is substantially horizontal when the base is resting on a horizontal surface.

It would have been obvious for a person of ordinary skill in the art to have resized the arms and/or the base of the NYSE System so the arm has a longitudinal length that is longer than the width of the base. Such a modification would have been a simple change of dimensions without changing functionality.

# **Secondary Reference**

#### The '939 patent

The '939 patent discloses a display system having a base, a pair of electronic displays, and an arm assembly that supports the displays. The arm assembly includes an arm that extends on either side of a support column and that has a longitudinal length that is longer than the width of the base

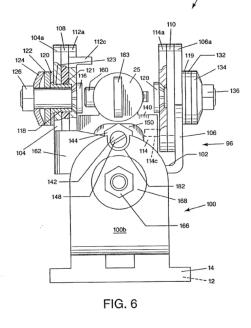


attachments of the NYSE System to include such a feature as a matter of simple substitution of one known element for another known element to yield predictable results.

#### **Secondary Reference**

#### The '672 patent

The '672 patent describes a mounting system for a flat panel display. The disclosed system provides a multi-jointed and pivoted support system for a flat panel video display. See, for example, three axis pivot 30 (FIGS. 1-6, 22, and 27-29).



wherein: i) the front of the support arm on one side of the support column is bowed, and the front of the support arm on the other side of the support column is bowed so that in use the support arm The NYSE System is configured so the front of the support arm on one side of the support column is bowed, and the front of the support arm on the other side of the support column is bowed so tends to wrap around a user positioned in front of and viewing the displays,

that in use the support arm tends to wrap around a user positioned in front of and viewing the displays.

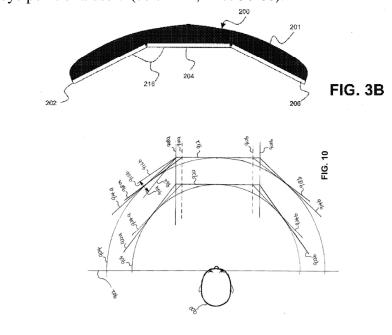


To the extent the arms of the NYSE System are not bowed so the front of the support arm on one side of the support column is bowed, and the front of the support arm on the other side of the support column is bowed, it would have been obvious for a person of ordinary skill in the art to have modified the arms to include such a feature. Such a modification would have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to have modified the arms of the NYSE System in view of one or more of the following secondary references to configure the arms so that the front of the support arm on one side of the support column is bowed, and the front of the support arm on the other side of the support column is bowed so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays.

#### Secondary References

### (1) The '337 patent

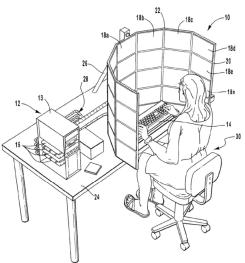
The '337 patent relates to a multi-panel video display system having a plurality of displays that are arranged so the display panels are substantially equidistant from an eye point of a user. The patent discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays. For example, the display panels are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. (column 2, lines 30-60).



#### (2) The '328 publication

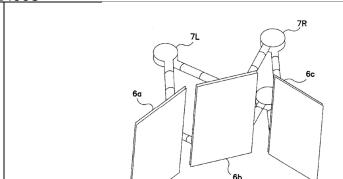
The '328 publication describes a multi-screen display system that includes a plurality of display screens that are concave in shape

about a user. (Abstract). The publication discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.



#### (3) The '890 patent

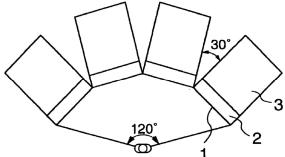
The '890 patent discloses a two-dimensional image display device that includes a curved display system wrapping about a user. The patent discloses that the display system is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.

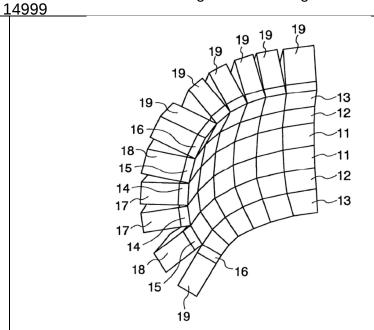


# (4) The '153 patent

The '153 patent discloses a multi-display apparatus that arranges display devices across a concave surface both in a horizontal visibility angle direction and a vertical visibility angle direction. The patent discloses that the display devices are bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.

FIG. 3A

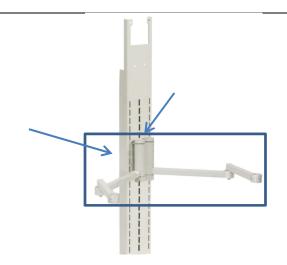




# (5) The Ergotron Design Station

The Ergotron Design Station discloses a display system that has a support arm assembly that is bowed at the front of the support arm assembly so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays.

	5000
	PC Workstation
and ii) the support arm is adapted to support most of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm,	The arms of the NYSE System are adapted to support most of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm. See, for example, displays 130 in Exhibit.
the support arm structure further comprising a mounting member with a hole and at least one aperture,	The support arm structure of the NYSE System includes a mounting member with a hole and at least one aperture.

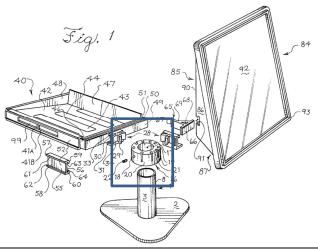


In addition, to the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting member with a hole and at least one aperture is a clamp that goes over a pole and has an opening for a tightening screw. To the extent the NYSE System does not have a support arm that includes a mounting member with a hole and at least one aperture, such a feature would have been obvious to a person of ordinary skill in the art. For example, it would have been obvious to have modified the NYSE System, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, and the '939 patent to include a clamp that goes over a pole and an opening for a tightening screw.

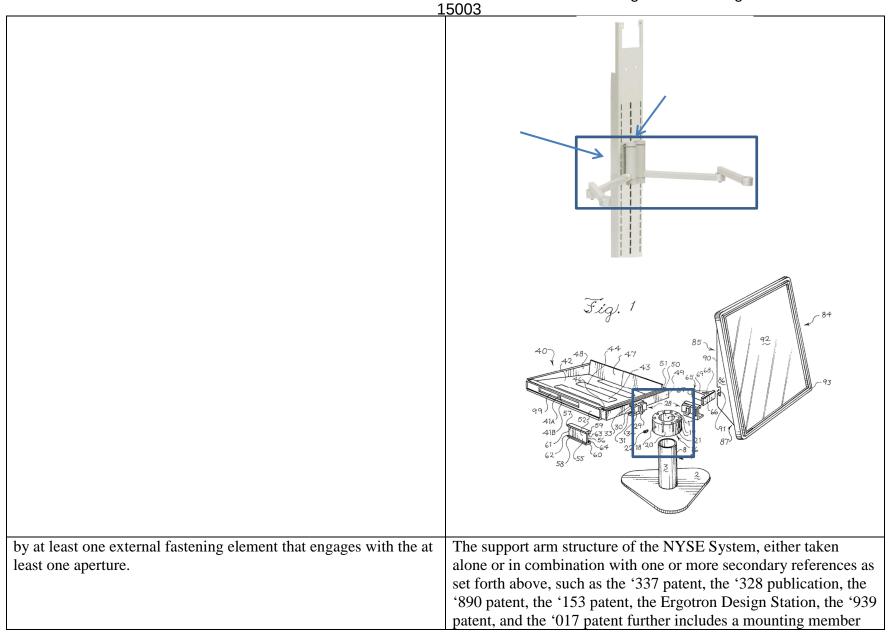
# **Secondary Reference**

The '017 patent

The '017 patent describes a display system having a foundational unit. With respect to FIG. 1, the reference describes the foundational unit 1 comprised of a base 2 and column 3. A supporting collar 16 can slip over the column 3 and is mounted to the column by means of a screw.



such that the support arm is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and The support arm structure of the NYSE System, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, the '939 patent, and the '017 patent further includes a mounting member with a hole and at least one aperture such that the support arm structure is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole. For example,



with a hole and at least one aperture such that the support arm structure is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and by at least one external fastening element that engages with the at least one aperture. For example,

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15000	<u> </u>
	Fig. 1  40  42  43  51  50  49  43  51  50  49  49  41  41  41  41  41  41  41  41

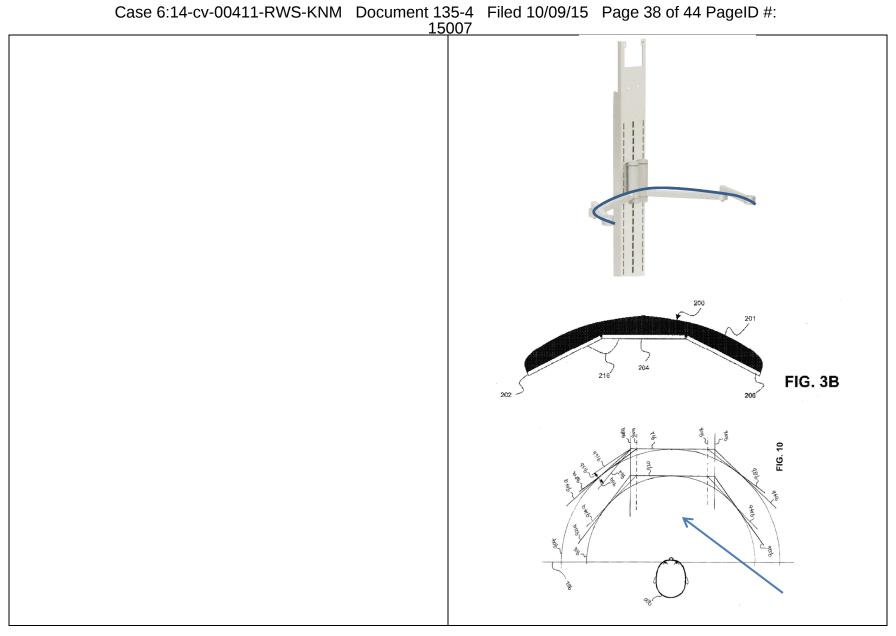
Claim 10	The NYSE System
The display system of claim 9,	
wherein the support arm supports all of the weight of the displays	The arms of the NYSE System support all of the weight of the
when the displays are connected to the support arm.	displays when the displays are connected to the support arm. See,
	for example, displays 130 in Exhibit.

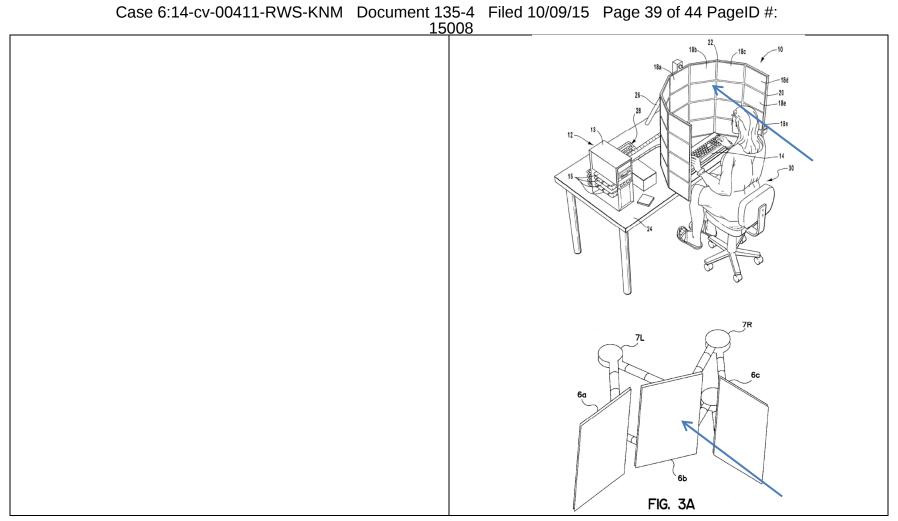
Claim 11	The NYSE System
The display system of claim 10,	
wherein the support arm has a plane asymmetry perpendicular to	The support arm of the NYSE System has a plane of symmetry
the arm,	perpendicular to the arm.

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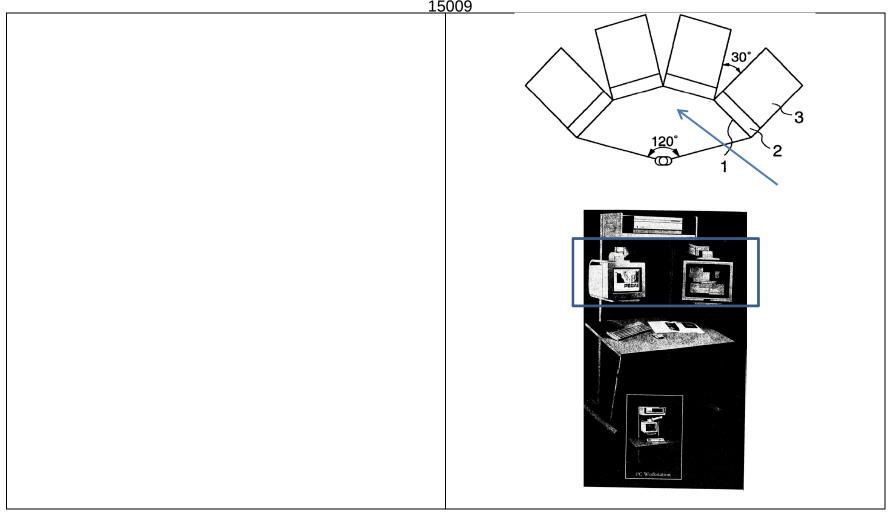
	.5006
said plane being vertical when the base is resting on a horizontal surface.	The plane of symmetry of the NYSE System, either taken alone or in combination with one or more secondary prior art references as set forth above, such as the '939 patent is vertical when the base is resting on a horizontal surface. See, for example, base 110 Exhibit.

The NYSE System
The support arm of the NYSE System, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent and the Ergotron Design Station, is configured so the bowed part of the support arm describes a smooth curve.





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Claim 14	The NYSE System
The system of claim 9,	
wherein the support arm is formed as a single piece component.	To the extent Mass's Infringement Contentions are discernible,
	the feature apparently alleged to be a support arm formed as a
	single piece component is a multi-piece arm having joints (e.g.,

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	hinges) connecting the different pieces of the support arm. The arms of the NYSE System are connected by joints (e.g., hinges). To the extent the arms of the NYSE System are not formed as a single piece component, such a feature would have been obvious to a person of ordinary skill as merely making integral what was previously separate pieces.
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Claim 16	The NYSE System
The system of claim 1,	
wherein the thickness of the support arm is less than the distance	The thickness of the support arm of the NYSE System is less than
between adjacent connectors.	the distance between adjacent connectors.

Claim 17	The NYSE System
The system of claim 9,	
wherein the thickness of the support arm is less than the distance	The thickness of the support arm of the NYSE System is less than
between adjacent connectors.	the distance between adjacent connectors.

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15011	

support arm in the NYSE System on one side of mn has a radius of curvature in the range of 24-36

	In addition, configuring the support arm so the front of the support arm on one side of the support column has a radius of curvature in the range of 24-36 inches would have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to have modified the NYSE System in view of one or more of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent and the Ergotron Design Station to configure the front of the support arm on one side of the support column to have a radius of curvature in the range of 24-36 inches. As one particular example, the display panels of the '337 patent are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. This range overlaps with the claimed range.
and the front of the support arm of the other side of the support column has a radius of curvature in the range of 24-36 inches.	The front of the support arm in the NSYE System on the other side of the support column has a radius of curvature in the range of 24-36 inches.

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In addition, configuring the support arm so the front of the support arm on the other side of the support column has a radius of curvature in the range of 24-36 inches would have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to modified the NYSE System in view of one or more of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent and the Ergotron Design Station to configure the front of the support arm on the other side of the support column to have a radius of curvature in the range of 24-36 inches. As one particular example, the display panels of the '337 patent are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. This range overlaps with the claimed range.

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